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November 25, 2024

By ECF

Hon. Eric Komitee
U.S. District Judge
U.S. Courthouse
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: U.S. v. Asif Merchant
24 Cr. 362 (EK)

Dear Judge Komitee:

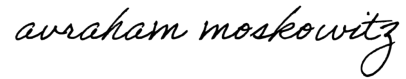
This letter is respectfully submitted to request authorization, *nunc pro tunc* to July 16, 2024, the date of Mr. Merchant's arrival in this District, for the use of members of my firm to assist me in the representation of Mr. Merchant.

As Your Honor knows, this is a difficult and complex case with a substantial amount of discovery that must be reviewed with a client who is in solitary confinement at the MDC and is subject to Special Administrative Measures ("SAMS"). The case also involves discovery material that will require security clearance to review and that will have to be reviewed in a SCIF. Finally, given the nature of the charges, I anticipate that there will be extensive motion practice both with respect to Mr. Merchant's conditions of confinement and with respect to the nature and extent of the discovery that the Government will provide.

In light of the above, it is respectfully requested that the Court permit my colleagues and staff to assist me in representing Mr. Merchant. Specifically, I am requesting that the Court permit my partner, Deborah Colson, who is a member of this Court's CJA panel, my associate, Christopher Neff, who has been working with me for more than a decade and has assisted me on most of my cases, including CJA cases, any my paralegal, Benzion Moskowitz, to work with me on this case. Their assistance is necessary to ensure that Mr. Merchant receives effective assistance of counsel and that the case moves forward as expeditiously as possible. If the Court grants this request, Ms. Colson will bill at the regular CJA rate, Mr. Neff will bill at the standard rate for associates who are not on the CJA Panel, and the paralegal time will be billed at the standard CJA rate of \$75/hour.

Thank you in advance for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink that reads "avraham moskowitz" in a cursive, lowercase style.

Avraham C. Moskowitz